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Attorneys for Plaintiff CellLink Corp.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CELLINK CORP.

Plaintiff,

vs.

MANAFLEX LLC,

Defendant.

CASE NO. 4:23-cv-04231-HSG

**STIPULATED REQUEST FOR ORDER
MODIFYING BRIEFING SCHEDULE
RE: CELLINK CORP.'S MOTION TO
DISMISS MANAFLEX LLC'S UNFAIR
COMPETITION COUNTERCLAIM
AND ORDER**

[Civil L.R. 6-2]

Demand for Jury Trial

Complaint Filed: August 18, 2023

Plaintiff CelLink Corp. (“Plaintiff”) and Defendant Manaflex LLC (“Defendant”) (together, the “Parties”) hereby stipulate under Civil Local Rule 6-2(a) to request an order (1) extending the deadline for Defendant to respond to Plaintiff’s Motion to Dismiss Manaflex LLC’s Unfair Competition Counterclaim (ECF No. 74) from July 23, 2024 to August 6, 2024 and (2) extending the deadline for Plaintiff to file its Reply to Defendant’s Opposition from July 30, 2024 to August 13, 2024.

The requested extension is warranted to accommodate holiday travel and the schedules of the Parties’ counsel. Declaration of Alison Anderson (“Anderson Decl.”) ¶ 4.

There have been four previous extensions of time in this case:

(1) a stipulated extension of time to respond to the complaint that was filed on September 11, 2023 and granted on September 12, 2023. Anderson Decl. ¶ 5.

(2) a stipulated extension of time for the Parties to file a Joint Case Management Statement and selecting an ADR process that was filed on November 7, 2023, and granted on November 8, 2023. *Id.*

(3) a stipulated extension of time to respond to counterclaims that was filed on November 27, 2023 and granted on November 28, 2023. *Id.*

(4) a stipulated extension of time to respond to counterclaims that was filed on June 12, 2024 and granted on June 12, 2024. *Id.*

The brief extensions of time requested here would have no effect on any other scheduled deadlines for the case. Anderson Decl. ¶ 6.

Dated: July 17, 2024

BOIES SCHILLER FLEXNER LLP

/s/ Alison L. Anderson

Alison L. Anderson

Eric J. Maurer

Beko Reblitz-Richardson

Attorneys for Defendant Manaflex LLC

1 Dated: July 17, 2024

/s/ Jason Lao

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11 **ECF ATTESTATION**

12 I, Alison L. Anderson, am the ECF User whose ID and password are being used to file this
13 Stipulated Request For Order Modifying Briefing Schedule re: CellLink Corp.'s Motion To
14 Dismiss Manaflex LLC's Unfair Competition Counterclaim and [Proposed] Order. In compliance
15 with Civil Local Rule 5-1(i)(3), I hereby attest that Jason Lao, counsel for CellLink Corp., has
16 concurred in this filing.


18 Dated: July 17, 2024

/s/ Alison L. Anderson

Alison L. Anderson

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2
3
4 Dated: 7/18/2024


The Honorable Haywood S. Gilliam, Jr.
United States District Judge